

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>Bk. No. 5:15-02683 RNO</b>
<b>BEATA BARAN</b>	:	
	:	
<b>Debtors</b>	:	<b>Chapter No. 13</b>
	:	
	:	

**NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the undersigned appears for **LOANCARE, LLC** (“the Creditor”), and pursuant to Bankruptcy Rule 2002(g) and 2002(h) and 9007 and §1109(b) of the Bankruptcy Code, with regards to the real property, located at 7 COBBLEWOOD DR No. K3, MOUNT POCONO, PA 18344-1715 with the mortgage recorded on June 25, 2009 Book 2355, Page 5724 demands that all notices that are required to be given in this case and all papers that are required to be served in this case, be given to and served upon the undersigned at the office, post office address and telephone number set forth below.

**PLEASE TAKE FURTHER NOTICE** that pursuant to §1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral whether transmitted or conveyed by mail, delivered, telephone, telegraph, telex or otherwise which affect or seek to affect in any way the Creditor’s rights or interest, with respect to Debtor or the property on which Creditor holds a first mortgage lien.

April 17, 2019

/s/ Mario J. Hanyon, Esquire  
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